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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 K.A.,

11 Plaintiff,

12 v.

13 MINDGEEK S.A.R.L. a foreign entity;
MG FREESITES LTD, a foreign
14 entity; MINDGEEK USA
INCORPORATED, a Delaware
15 corporation; MG PREMIUM LTD, a
foreign entity; MG GLOBAL
16 ENTERTAINMENT INC., a Delaware
corporation; 9219-1568 QUEBEC,
17 INC., a foreign entity; BERND
BERGMAIR, a foreign individual;
18 FERAS ANTOON, a foreign
individual; DAVID TASSILLO, a
19 foreign individual; VISA INC., a
Delaware corporation; REDWOOD
20 CAPITAL MANAGEMENT, LLC, a
Delaware limited liability company;
21 REDWOOD DOE FUNDS 1-7;
COLBECK CAPITAL
22 MANAGEMENT, LLC, a Delaware
limited liability company; COLBECK
23 DOE FUNDS 1-3,

24 Defendants.
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CASE NO. 2:24-cv-04786

**PLAINTIFF'S NOTICE OF
RELATED CASES**

1 K.A. hereby files this Notice of Related Cases under Central District of
2 California Local Rule 83-1.3.1 regarding the following actions filed on February
3 19, 2021 and June 17, 2021, respectively, in this District Court: (1) *Jane Doe v.*
4 *MindGeek USA Incorporated et al.*, Civil Action No. 8:21-cv-00338-CJC-ADS,
5 currently pending before the Honorable Wesley L. Hsu; and (2) *Serena Fleites v.*
6 *MindGeek S.a.r.l. et al.*, Case No. 2:21-cv-4920, currently pending before the
7 Honorable Wesley L. Hsu. The actions have a substantial overlap in defendants
8 and have some of the same factual allegations. It would further the interests of
9 judicial efficiency to have them heard by the same judge.

10 *Jane Doe v. MindGeek USA Incorporated et al.* is a class action seeking
11 damages and injunctive relief against defendants – (i) MindGeek USA
12 Incorporated (ii) MindGeek S.A.R.L., (iii) MG Freesites, Ltd., (d/b/a Pornhub),
13 (iv) MG Freesites II, Ltd., (v) MG Content RT Limited, and (vi) 9219-1568
14 Quebec Inc. (d/b/a MindGeek) – based on allegations that defendants violated the
15 Trafficking Victims Protection Reauthorization Act (“TVPRA”), specifically 18
16 U.S.C. §§ 1591 and 1595, among other laws, by financially benefiting from, or
17 otherwise participating in, a sex trafficking venture in which the plaintiff and
18 members of the class were victims. Further, the plaintiff alleges that the
19 defendants violated 18 U.S.C. § 2258A by failing to report child sexual abuse
20 materials on their websites and 18 U.S.C. § 2252A for knowingly receiving and
21 distributing child pornography depicting plaintiff and the class on their websites.
22 On November 17, 2023, the Court granted Plaintiff’s Motion for Class
23 Certification and certified under both Federal Rules of Civil Procedure 23(b)(2)
24 and 23(b)(3) two classes. (Dkt. 209, Order Granting Plaintiff’s Motion for Class
25 Certification, *Jane Doe v. MindGeek USA Incorporated et al.*, Case No. 8:21-cv-
26 00338-WLH-ADS (C.D. Cal. 2021).) The Court first certified a national class
27 including “all persons who were under the age of 18 when they appeared in a video
28 or image that has been uploaded or otherwise made available for viewing on any

1 website owned or operated by Defendants in the last ten years.” (Dkt. 107 at 44, ¶
2 154.) The Court next certified a subclass of “all persons residing in California who
3 were under the age of 18 when they appeared in a video or image that has been
4 uploaded or otherwise made available for viewing on any website owned or
5 operated by Defendants in the last ten years.” (*Id.* at ¶ 155.) Plaintiff in this
6 related action is represented by the following counsel: Susman Godfrey L.L.P. and
7 Pollock Cohen LLP.

8 *Serena Fleites v. MindGeek S.a.r.l. et al.* is an action seeking damages and
9 injunctive relief against defendants – (i) MindGeek S.a.r.l., (ii) MG Freesites, Ltd.
10 d/b/a Pornhub (“Pornhub”), (iii) MindGeek USA Incorporated (“MindGeek
11 USA”), MG Premium Ltd., (iv) MG Global Entertainment, Inc., and (v) 9219-1568
12 Quebec, Inc. (collectively “MindGeek”); (vi) Bernd Bergmair, (vii) Feras Antoon,
13 and (viii) David Tassillo (Bergmair, together with Antoon and Tassillo, the
14 “Individual Defendants,” and together with MindGeek, the “MindGeek
15 Defendants”); (ix) Visa Inc. (“Visa”); (x) Redwood Capital Management, LLC,
16 (xi) Redwood Master Fund, LTD, (xii) Redwood Opportunity Master Fund, Ltd.,
17 (xiii) Manuel 2018, LLC, (xiv) Gingogerum, LLC, and (xv) White-Hathaway
18 Opportunity Fund, LLC (collectively, “Redwood”); (xvi) Colbeck Capital
19 Management, LLC, (xvii) CB Media Ventures LLC, (xviii) CB Agency Services,
20 LLC, and (xix) CB Participations SPV, LLC (collectively “Colbeck”) (Colbeck,
21 together with the MindGeek Defendants, Visa, and Redwood, “defendants”) – for
22 sex trafficking and conspiracy to benefit from a trafficking venture in violation of
23 18 U.S.C. §§ 1591, 1594, and 1595, for receipt, transport, and possession of child
24 pornography in violation of 18 U.S.C. §§ 2252, 2252A, and 2255, and state
25 statutory and common law violations. Plaintiff in this related action is represented
26 by the following counsel: Brown Rudnick LLP and Olson Stein LLP.

1 DATED: June 7, 2024

Respectfully submitted,

2 BROWN RUDNICK LLP

3
4 By: /s/ Michael J. Bowe

5 Michael J. Bowe

6 (*pro hac vice* application forthcoming)

7 Lauren Tabaksblat

8 (*pro hac vice* application forthcoming)

9 *Attorneys for Plaintiff*